

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JONATHAN LACY,)	
)	
Plaintiff,)	Case No.: 1:22-cv-01335
)	
v.)	
)	
COUNTY OF COOK, COOK COUNTY)	Honorable Sara L. Ellis
SHERIFF THOMAS DART,)	
LIEUTENANT J. GUST, LIEUTENANT)	
A. LUPPINO, OFFICER A.)	
STUBENVOLL, OFFICER T. JACKSON,)	
OFFICER K. WOODS, OFFICER J.)	
OLIVAS, OFFICER M. HILL, OFFICER)	
C. HILL, OFFICER G. FLORES,)	
OFFICER T. PRINE, OFFICER F.)	
HUGHES, OFFICER G. HARPER and)	
OFFICER E. OLEA,)	

Defendants.

**AGREED MOTION FOR ENTRY OF
CONFIDENTIALITY ORDER**

NOW COME Defendants, COUNTY OF COOK and COOK COUNTY SHERIFF THOMAS DART, by and through their attorneys DeVore Radunsky LLC, and in support of this Agreed Motion for Entry of Confidentiality Order, states the following:

1. The parties communicated on February 13, 2023, and agreed that the entry of a Confidentiality Order was necessary and to ensure all documents produced in this case were bates stamped privileged and/or confidential.

2. The proposed Confidentiality Order is based upon the “model” Confidentiality Order set forth on Your Honor’s Court homepage and attached to this motion as Exhibit “A”.

WHEREFORE, Defendants, COUNTY OF COOK and COOK COUNTY SHERIFF THOMAS DART, by and through their attorneys DeVore Radunsky LLC, and Plaintiff,

JONATHAN LACY, by and through his attorneys, Schain, Banks, Kenny & Schwartz, respectfully request an Order entered as follows:

1. The Motion for Entry of Confidentiality Order is granted,
2. The Confidentiality Order is entered, and
3. Any further relief this Court deems appropriate.

Respectfully Submitted,

By: /s/ Troy S. Radunsky
Troy S. Radunsky
Attorney for Defendants
DeVore Radunsky LLC
230 W. Monroe St., Ste 230
Chicago, Illinois 60606
tradunsky@devoreradunsky.com

By: /s/ Nicholas Standiford
Nicholas Standiford
Attorney For Plaintiff
Schain Banks
70 W. Madison, Suite 2300
Chicago, IL 60602
nstandiford@schainbanks.ocm

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on February 14, 2023, he electronically filed the foregoing document, which will send a notice of electronic filing to all counsel of record.

/s/ Troy S. Radunsky
Troy S. Radunsky